

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CHAMILIA, LLC,) KMK
Plaintiff,) Civil Action No.: 04-CV-06017 (HB)
v.)
PANDORA JEWELRY, LLC,)
Defendant.) **MOTION FOR ADMISSION
PRO HAC VICE**

Pursuant to Local Rule 1.3(c) and upon the accompanying Declarations of Dylan D. Smith and James G. Goggin, the undersigned hereby moves for *pro hac vice* admission of Attorney James G. Goggin in the above-captioned case.

The undersigned is a member of the bar of this Court and an associate with the Portland, Maine law firm of Verrill Dana, counsel to Plaintiff Chamilia, LLC. The undersigned certifies that he is actively associated with, and will at all times remain associated in this action with Attorney Goggin, who is also with the firm Verrill Dana. As set forth in his accompanying Declaration, Attorney Goggin is a member in good standing of the bars of the following courts: the Supreme Court of the United States, the U.S. District Court for the District of Maine, the U.S. Court of Appeals for the First Circuit, and the U.S. Court of Appeals for the Tenth Circuit.

Dated: September 14, 2004



Dylan D. Smith (DS 6740)
Attorney for Plaintiff's

VERRILL DANA, LLP
One Portland Square
P.O. Box 586
Portland, ME 04112-0586
(207) 774-4000
(207) 774-7499 (fax)

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CHAMILIA, LLC,)
of New York, New York,)
Plaintiff,)
v.) Civil Action Docket No.
PANDORA JEWELRY, LLC,) 04 CV 06017 (HB)
of Columbia, Maryland.)
Defendant.)

DECLARATION OF DYLAN D. SMITH

Pursuant to 28 U.S.C. § 1746, Dylan D. Smith hereby declares as follows:

1. I am an associate with the law firm of Verrill Dana, LLP, in Portland, Maine. I
am a member in good standing of the bar of the United States District Court for the Southern
District of New York and have entered an appearance on behalf of Plaintiff Chamilia, LLC. I
submit this declaration in support of the accompanying motion to admit James G. Goggin to
practice before this Court *pro hac vice*.

2. James G. Goggin is a partner with Verrill Dana. I know him to be an attorney of the highest moral, ethical and professional standards.

3. I will remain associated with Mr. Goggin throughout the pendency of this matter, accept service of all processes, notices and other papers, and attend any proceeding as required by the Court

I declare under penalty of perjury that the foregoing is true and correct. Executed on
September 14, 2004.

Dylan D. Smith
Attorney for Plaintiff Chamilia, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CHAMILIA, LLC,)
of New York, New York,)
Plaintiff,)
v.) Civil Action Docket No.
PANDORA JEWELRY, LLC,) 04 CV 06017 (HB)...
of Columbia, Maryland,)
Defendant.)

DECLARATION OF JAMES G. GOGGIN

Pursuant to 28 U.S.C. § 1746, James G. Goggin, hereby declares as follows:

1. I am a partner with Verrill Dana, LLP, counsel to Plaintiff Chamilia, LLC in the above-captioned action. I submit this declaration in support of the accompanying Motion for Admission *Pro Hac Vice*.

2. I am a member in good standing, eligible to practice in and have been admitted to the following courts: the U.S. District Court for the District of Maine since 1979, the U.S. Court of Appeals for the First Circuit since 1983, the U.S. Court of Appeals for the Tenth Circuit since 2004, and the U.S. Supreme Court since 1991. Attached hereto are my certificates of good standing for each of these courts. I am not currently under any order of disbarment, suspension, or any other discipline.

3. I will at all times have associated with me Dylan D. Smith, Esq., a member of the bar of the U.S. District Court for the Southern District of New York and who is also with the firm Verrill Dana LLP, upon whom all process, notices and other papers may be served and who will sign all papers filed with the Court and whose attendance at any proceeding may be required by the Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 1, 2004.



James G. Goggin
Attorney for Plaintiff
Chamilia, LLC

VERRILL DANA, LLP
One Portland Square
Portland, ME 04112
Direct: (207) 253-4602
Fax: (207) 774-7499
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Supreme Court of the United States



JAMES G. GOGGIN
OF PORTLAND, MAINE

was duly admitted and qualified as an Attorney and Counselor for the Supreme Court of the United States on the twentieth day of September in the year one thousand nine hundred and ninety-one, and is now a member of the Bar of this Court in good standing.

In testimony, whereof, as Clerk of said Court, I have hereunto set my hand and affixed the seal of said Court, at the City of Washington, this thirty-first day of August 2004.

William K. Suter

Clerk of the Supreme Court

of the United States

By

W. K. Suter
Assistant Admissions Officer

CERTIFICATE OF GOOD STANDING

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

I, William S. Brownell, Clerk of the United States District Court for the District of Maine, DO HEREBY CERTIFY that JAMES G. GOGGIN was duly admitted to practice in said Court on October 29, 1979, and is in good standing as a member of the bar of said Court.

William S. Brownell
Clerk

By: 
Deputy Clerk

Dated this 27th day of August, 2004.



For the
First Circuit

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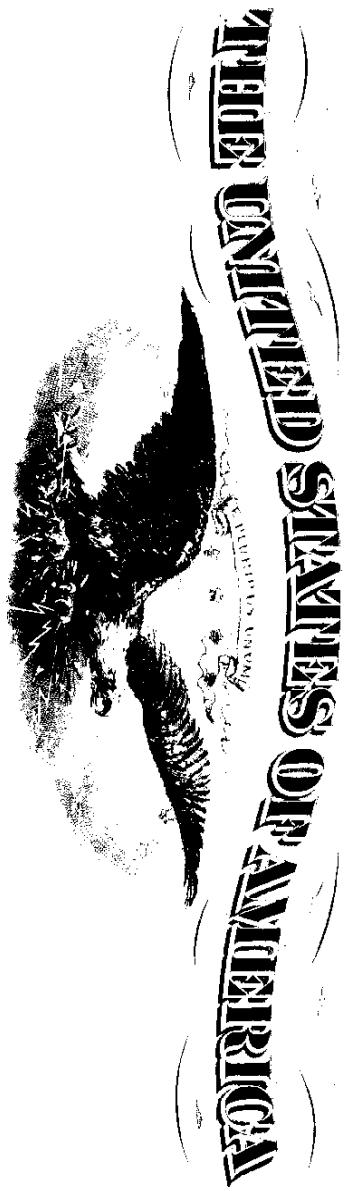
Certificate of Good Standing

I, Richard Cushing Donovan, Clerk of the United States Court of Appeals for the First Circuit, do hereby certify that James G. Goggin was on the fifth day of October, in the year of our Lord, one thousand, nine hundred and eighty-three, admitted to practice as an Attorney and Counsellor for the United States Court of Appeals for the First Circuit, and that said Attorney has ever since been in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of the United States Court of Appeals for the First Circuit, this twenty-seventh day of August in the year of our Lord two thousand and four.



Clerk of the United States Court of Appeals for the First Circuit



for the Tenth Circuit

I, Patrick Fisher, Clerk of the United States Court of Appeals for the Tenth Circuit,

DO HEREBY CERTIFY that James G. Goggin was

duly admitted to practice before this Court on April 22, 2004,

and is in good standing. There have been no disciplinary actions instituted in this court.

Dated at Denver, Colorado, on September 2, 2004.

PATRICK FISHER
Clerk

By _____
Deputy Clerk

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CHAMILIA, LLC,) Civil Action No.: 04-CV-06017 (HB) 11840
Plaintiff,)
v.)
PANDORA JEWELRY, LLC,)
Defendant.)

CERTIFICATE OF SERVICE

I, Dylan D. Smith, hereby certify that I have this day caused a copy of the foregoing Motion for Pro Hac Vice Admission, the Declaration of James G. Goggin, Proposed Order, and the Affidavit of Dylan D. Smith to be sent by first class mail, postage prepaid, to counsel of record as follows:

William R. Hansen, Esq.
Lathrop & Gage
230 Park Avenue, Suite 1847
New York, NY 10169

Dated at Portland, Maine this 17th day of September, 2004.

Dylan D. Smith, Esq. (DS 6740)
Attorney for Plaintiff

VERRILL DANA, LLP
One Portland Square
P.O. Box 586
Portland, ME 04112
(207) 774-4000

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Defendant.)

ORDER

The Motion for *Pro Hac Vice* Admission dated September 17, 2004 is hereby
GRANTED.

U.S. District Court Judge